

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

FABRICE TOURRE,

Defendant.

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Civil Action

No.: 10-cv-3229 (KBF)

ELECTRONICALLY FILED

**NOTICE OF FABRICE TOURRE’S MOTION IN LIMINE TO PRECLUDE EVIDENCE
AND ARGUMENT ATTEMPTING TO LINK ABACUS 2007-AC1 TO THE COLLAPSE
OF ACA AND ABN DURING THE FINANCIAL CRISIS**

PLEASE TAKE NOTICE that, upon the memorandum of law submitted herewith, Defendant Fabrice Tourre will move this Court, before the Honorable Katherine B. Forrest, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an order pursuant to Federal Rules of Evidence 401, 402 and 403 precluding the SEC from referencing, eliciting or introducing into evidence at trial arguments or evidence to attempt to suggest that the collapse of ACA Capital Holdings, Inc. and ABN AMRO Bank N.V. during the financial crisis was somehow caused, in whole or in part, by their respective exposures to the ABACUS 2007-AC1 CDO.

Dated: May 29, 2013
New York, New York

Respectfully submitted,

/s/ Pamela Rogers Chepiga

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